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71108

International Specialists in the Environment

SF FILE NUMBER

FILE PLAN

MEMORANDUM

TO:

Mike Zimmerman, OSC

EPA/ERB - Denver

FROM:

Troy Sanders T. Sandus

TAT - Region VIII

Cordel Schmidt

TAT - Region VIII

DATE:

September 11, 1992

SUBJECT:

Regarding the September 10, 1992 memorandum

transmitting TAT's response to the PRP complaint on well installation activities at the Richardson Flats

Tailing Site, TDD# T08-9207-019

Should the EPA wish to discuss these matters further, or discuss alternative approaches to the groundwater studies at the site, E&E is available to do so at your convenience. Also a point considered inappropriate for inclusion within the Richardson Flats Reply by TAT is the fact that Pioneer Technical Services, Inc. (PTS) assertions are further called into question by the fact that the principal author of the PTS report had previously performed work at the site as an E&E employee on behalf of USEPA and installed wells at the Richardson Flats Tailings site using the identical protocol that are now being criticized; in addition, he worked on the development of the Hazard Ranking System (HRS) scoring package that formed the basis for EPA's finding that the site posed a significant threat, and which resulted in the TAT study that is now being questioned.